

THE LAW OFFICE OF

ELISA HYMAN, P.C.

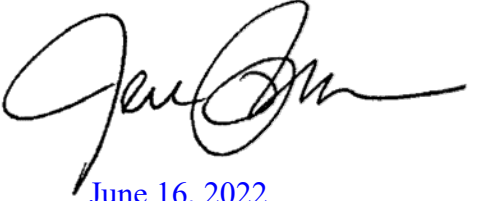
June 15, 2022

VIA ECF

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *N.J. and G.J. v. N.Y.C. Dep't of Educ., et al.*
18-cv-06173 (JMF)

Application GRANTED, nunc pro tunc. The parties are reminded that pursuant to the Court's Individual Rules, Paragraph 1.F, all requests for extensions must be filed no later than 48 hours prior to the deadline and must include the information listed, including how many prior extensions of this deadline have been granted. The Clerk of Court is directed to terminate ECF No. 132. SO ORDERED.



June 16, 2022

Dear Judge Furman:

I represent the Plaintiffs in this action and am writing jointly with Defendants to provide (a) an update on the status of settlement pursuant to Your Honor's Order; (b) jointly request an extension of time to file the motions for reconsideration and motion to certify for interlocutory appeal ("Motions"); and (c) continue the stay of discovery until the parties complete the next settlement conference before Judge Moses. The parties apologize for the timing of this status letter.

As we advised the Court in our previous letter, we had one final settlement conference scheduled for June 8, 2022, before Judge Moses. *See* dkt no. 127.¹ Unfortunately, however, Defendants' counsel had a family medical emergency and had to request to adjourn this conference. *See* dkt. nos. 130-131. Plaintiffs' counsel did not object under the circumstances. Judge Moses rescheduled the settlement conference for July 14, 2022. *Id.*

The parties are still on settlement track and as we had noted in our prior letter, we continue to hope that with Judge Moses's assistance, we can reach an agreement.

As we are still on settlement track and engaged in negotiations, we respectfully request that the Court (a) extend the time for the parties to file Motions; and (b) continue the stay of discovery. The parties further respectfully propose to provide another status update to the Court by July 18, 2022. Moreover, Plaintiffs request that the deadline for the Plaintiffs to file their Motions to be set for four weeks after the next status letter, rather than on the date of the next status letter, as Plaintiffs would need time to prepare the motions in the event that the settlement process is unsuccessful, and Plaintiffs' counsel is going to be out of the office (and likely out of the country

¹ This conference was originally scheduled for last week, which is why this letter was scheduled for one week later.

without reliable internet access) July 23, 2022 to August 7, 2022. Defendants consent to this request.

Respectfully Submitted,

/s/ Elisa Hyman

Elisa Hyman, Esq.
Counsel for Plaintiffs

cc: Andrew Rauchberg, Esq., *Counsel for Defendants*